IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

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In re:		:	Chapter 11
		:	
JUNIPER GTL LLC ¹		:	Case No. 16-31959
		:	
		:	
	Debtor.		
		-	

NOTICE OF HEARING OF CERTAIN "FIRST DAY" MATTERS ON APRIL 18, 2016

PLEASE TAKE NOTICE that on April 14, 2016, Juniper GTL LLC (the "<u>Debtor</u>") filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of Texas (the "Court").

PLEASE TAKE FURTHER NOTICE that a hearing will be held before the Honorable Marvin Isgur, United States Bankruptcy Judge, on April 18, 2016, at 2:00 p.m. (Central Time) (the "Hearing"), in the United States Bankruptcy Court for the Southern District of Texas, Courtroom 404, 515 Rusk Street, Houston, Texas 77002.

PLEASE TAKE FURTHER NOTICE that the Debtor has requested emergency consideration of the following applications and motions (collectively, the "<u>First Day Motions</u>") at the Hearing:

- 1. Notice of Designation as a Complex Chapter 11 Case
- 2. Emergency Motion Pursuant to 11 U.S.C. §§ 105, 361, 363, and 364 for Interim and Final Orders (I) Authorizing the Debtor to (A) Obtain Post-Petition Financing

The last four digits of the Debtor's federal tax identification number is 3161. The Debtor's mailing address is 3 Riverway, Suite 1050, Houston, Texas 77056.

- and (B) Grant Senior Liens, Junior Liens, and Superpriority Administrative Expense Status; (II) Scheduling a Final Hearing; and (III) Granting Related Relief
- 3. Emergency Motion for an Order Establishing Certain Notice Procedures
- 4. Emergency Motion for Entry of an Order (A) Authorizing Payment of Pre-Petition Wages, Payroll Taxes, Certain Employee Benefits, and Related Expenses and (B) Directing Banks to Honor Related Pre-Petition Transfers
- 5. Emergency Motion for an Order Authorizing Continued Use of Pre-Petition Bank Accounts, Cash Management System, Forms, Books and Records, and Investment Accounts and Procedures
- 6. Emergency Motion to Continue Pre-Petition Insurance and Workers' Compensation Programs and to Pay Pre-Petition Premiums, Related Obligations, and Premium Financing Payments
- 7. Emergency Application for An Order Appointing Donlin, Recano & Company, Inc. as Noticing and Balloting Agent for the Debtor Pursuant to 28 U.S.C. § 156(C), Effective From the Petition Date
- 8. Emergency Motion for an Order Establishing Bar Dates for Filing Claims and Approving Form and Manner of Notice Thereof
- 9. Emergency Motion to Reject Executory Contracts

PLEASE TAKE FURTHER NOTICE that at the Court may consider evidence at the Hearing and may grant the relief requested on some or all of the First Day Motions. If you object to any of the relief requested in the First Day Motions you, or your attorney, should file an immediate response or appear in person, or telephonically, at the Hearing.

PLEASE TAKE FURTHER NOTICE the Debtor has also filed (or intends to filed) the following plan-related documents:

- 10. Motion for an Order (I) Approving Disclosure Statement, (II) Approving Solicitation Package, (III) Establishing Voting Record Date for Entitlement to Solicitation Package and to Vote on Plan of Liquidation, (IV) Approving Procedures for Distribution of Solicitation Package, (V) Approving Form of Ballots, (VI) Establishing Last Date for Receipt of Ballots, (VII) Approving Procedures for Vote Tabulation, (VIII) Establishing Deadline and Procedures for Filing Objections to Confirmation of Plan of Liquidation, and (IX) Approving Form of Manner of Notice of Confirmation Hearing and Related Issues
- 11. Juniper GTL LLC's Chapter 11 Plan of Liquidation

12. Juniper GTL LLC's Disclosure Statement for its Chapter 11 Plan of Liquidation Pursuant to the Court's *Procedures for Complex Chapter 11 Cases*, if a debtor files a plan and disclosure statement prior to the initial finance hearing (which will be during the Hearing), then the Court will set the date for the disclosure statement hearing and related objection deadlines, and consider setting the date for the confirmation hearing and related voting and objection deadlines during such initial finance hearing. At the Hearing, the Debtor intends to request that the Court set the disclosure statement hearing and the confirmation hearing (and their associated objection deadlines) at the earliest dates permitted by the Federal Rules of Bankruptcy Procedure. If the Court sets the disclosure statement hearing and confirmation hearing during the Hearing, the Debtor will file additional notices of such hearings consistent with the solicitation procedures approved by the Court.

PLEASE TAKE FURTHER NOTICE that copies of the First Day Motions, the planrelated documents, and the Declaration of David Rush in Support of Chapter 11 Petition and
First Day Pleadings may be: (1) inspected at the offices of the Clerk of the Court during normal
business hours; (2) downloaded for a fee from the Court's electronic case filing website at
https://ecf.txsb.uscourts.gov; or (3) downloaded for free from the website established by the
Debtor for its chapter 11 case at https://www.donlinrecano.com/juniper. Requests for the
foregoing documents may also be made by contacting the Debtor's counsel at the contact
information listed below.

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² Please note that prior registration with the PACER Service Center and payment of a fee may be required to access such documents. Parties in interest may sign up for a PACER account by visiting the PACER website at http://pacer.psc.uscourts.gov or by calling (800) 676-6856.

Respectfully Submitted,

Date: April 14, 2016

Houston, Texas

/s/ Mark W. Wege

Mark W. Wege (Texas Bar No. 21074225) Edward L. Ripley (Texas Bar No. 16935950) Jason S. Sharp (Texas Bar No. 24079897)

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Proposed Counsel for the Debtor and Debtor in Possession